

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO, EASTERN DIVISION

CAROL A. WILSON, <i>et al.</i> ,)	Case No.: 2:16-cv-1084
)	
Plaintiffs,)	Chief Judge Edmund A. Sargus
)	
vs.)	Magistrate Judge Kimberly A. Jolson
)	
CHAGRIN VALLEY STEEL)	
ERECTORS, INC., et al.)	<u>DEFENDANT'S / THIRD-PARTY</u>
)	<u>PLAINTIFF'S MOTION FOR SUMMARY</u>
Defendant / Third-Party Plaintiff)	<u>JUDGMENT</u>

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendant / Third-Party Plaintiff Chagrin Valley Steel Erectors, Inc. ("Chagrin Valley") respectfully requests that this Court grant summary judgment in its favor on Plaintiffs' complaint against Chagrin Valley (ECF No. 1), and on Chagrin Valley's counterclaim against Plaintiffs and Chagrin Valley's third-party complaint against Justin Helmick ("Helmick") (ECF Nos. 7 and 29).

In the interest of brevity, Chagrin Valley hereby submits its Brief in Opposition to Plaintiffs' and Helmick's Motion for Summary Judgment against Chagrin Valley, and all exhibits are related filings thereto (all of which are being filed simultaneously with this Motion) in support of this Motion, as if fully rewritten herein, in lieu of the memorandum of support.

Respectfully submitted,

/s/ Melissa A. Jones

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CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically on November 7, 2017. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Melissa A. Jones
One of the Attorneys for Defendant /
Third-Party Plaintiff